

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

IN RE:

TRANSTEXAS GAS CORPORATION,

Debtor.

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§

CASE NO. 99-21550

**MOTION OF TRANSTEXAS GAS CORPORATION
FOR ENTRY OF FINAL DECREE
WITH RESPECT TO THE CHAPTER 11 CASE**

TransTexas Gas Corporation (the “Debtor”) as the debtor and debtor in possession in the in the above captioned case, by and through its undersigned counsel, hereby moves this Court (the “Motion”), pursuant to sections 350 and 105(a) of the Bankruptcy Reform Act of 1978, as codified in title 11 of the United States Code (as amended, the “Bankruptcy Code”) and Rule 3022 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) for entry of a final decree closing the chapter 11 case, filed on April 19, 1999, in the United States Bankruptcy Court for the District of Delaware, and transferred to the United States District Court for the Southern District of Texas, Corpus Christi Division, on May 20, 1999 (the “Case”). In support hereof the Debtor respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to entertain this Motion pursuant to 28 U.S.C. § 1334. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409. Consideration of this Motion is a core proceeding pursuant to 28 U.S.C. § 157(b). The statutory predicates for the relief requested herein are sections 350 and 105(a) of the Bankruptcy Code, and Rule 3022 of the

Bankruptcy Rules.

BACKGROUND

2. On April 19, 1999 (the "Petition Date"), the Debtor commenced its reorganization case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

3. The Debtor continued in possession of its respective properties and operated its businesses, as a debtor-in-possession, pursuant to sections 1107 and 1108 of the Bankruptcy Code, through the effective date of confirmation of the Chapter 11 Plan of Reorganization Proposed (the "Plan").

RELIEF REQUESTED

4. By this Motion, the Debtor is seeking to close the Case which has been fully administered, pursuant to sections 350 and 105(a) of the Bankruptcy Code and Rule 3022 of the Bankruptcy Rules.

ARGUMENT

5. Section 350(a) of the Bankruptcy Code states: "After an estate is fully administered, and the court has discharged the trustee, the court shall close the case." 11 U.S.C. § 350(a).

6. Rule 3022 of the Bankruptcy Rules provides: "After an estate is fully administered in a chapter 11 reorganization case, the court, on its own motion or on motion of a party in interest, shall enter a final decree closing the case." Fed. R. Bankr. P. 3022.

7. As of the date hereof, the Plan has been confirmed. The Debtor has substantially consummated the Plan and distributions thereunder have been made.

8. As contemplated and required by the Order confirming the Plan dated March 14,

2000 (the “Confirmation Order”), all documents and agreements necessary to implement and complete the Plan were executed in accordance with the terms of the Plan and Confirmation Order.

9. Four (4) ongoing adversary proceedings are currently ongoing in the Case. They include: (i) *Chanoco Corp., et al. v. TransTexas Gas Corporation, et al.*, adv. pro. no. 99-02220; (ii) *Chanoco Corp., et al. v. TransTexas Gas Corporation, et al.*, adv. pro. no. 99-02217; (iii) *Carson Energy Inc., et al. v. TransTexas Gas Corporation, et al.*, adv. pro. no. 99-02218; and (iv) *TransTexas Gas Corporation, et al. v. Forecenergy Onshore Inc, et al.*, adv. pro. no. 01-02011 (collectively, the “Adversary Proceedings”).

10. All expenses arising from the administration of these Cases, including court fees, professional fees, and expenses, have been paid.

11. Other than the Adversary Proceedings, all motions, contested matters, and other proceedings, which were before this Court have been resolved, other than this Motion.

NO PRIOR REQUEST

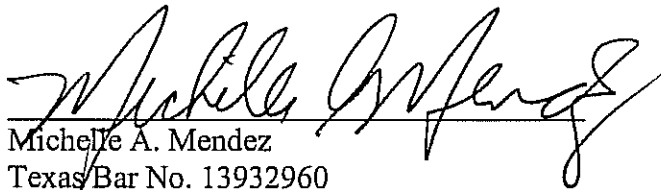
12. No prior request for the relief sought in this Motion has been made to this or any other court.

WHEREFORE, the Debtor respectfully requests that this Court enter a final decree, substantially in the form annexed hereto, closing this Case and grant such further relief as is just and proper.

Dated: September 13, 2004

Respectfully submitted,

GREENBERG TRAURIG, LLP

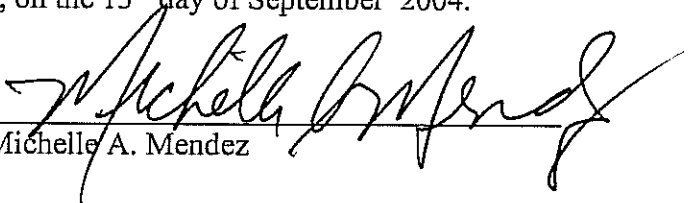
A handwritten signature in black ink, appearing to read "Michelle A. Mendez", is written over a horizontal line.

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**COUNSEL FOR TRANSTEXAS
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CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing Motion of TransTexas Gas Corporation for Entry of a Final Decree with Respect to the Chapter 11 Cases, were forwarded to the parties whose names and addresses appear on the attached service list, via first class United States Mail, postage prepaid, on the 13th day of September 2004.


Michelle A. Mendez

In re TransTexas Gas Corporation
Case No. 99-21550

TransAmerican Energy Corporation, et al. c/o Philip D. Devlin National Energy Group 4925 Greenville Avenue, Suite 1400 Dallas, TX 75206	Office of the US Trustee 515 Rusk Avenue, Suite 3516 Houston, TX 77002	ABB Combustion Engineering Systems David H. Simpson 2000 Day Hill Road Windsor, CT 06095
ADP Investor Communication Services, Inc. 51 Mercedes Drive Edgewood, NY 11717	Almare di Navigazione SPA c/o Tisdale & Lemon 10 Spruce Street Southport, CT 06490	American Petroleum Institute PO Box 1327 Merrifield, VA 22116
Anitra Morris c/o James E. Cazalot, Jr. 1001 Howard Avenue, Suite 4201 New Orleans, LA 70113	Belco Technologies Corporation 7 Entin Road Parsippany, NJ 07054	Bruce Applegarth c/o Harry A. Burglass 4437 Orleans Blvd. Jefferson, LA 70121
Butler & Binion LLP 1000 Louisiana, Suite 1600 Houston, TX 77002	C.H. Heist Corp. 45 Anderson Road Buffalo, NY 14225	C.V. Harold Rubber Co., Inc. 4431 Euphrosine Street New Orleans, LA 70125
CCS Industrial Sales, Inc. c/o Fletcher W. Cochran 1400 A. Gause Blvd. Slidell, LA 70458	CT Corporation System c/o Alan D. Budman 1150 Old York Road, 2 nd Floor Abington, PA 19001	Caplin & Drysdale Chartered One Thomas Circle, NW Washington, DC 20005
Charles T. Kerner Barbara Kerner, et al. c/o Steven Gordon PO Box 31900-231 Houston, TX 77231-1900	Chas S. Lewis & Co., Inc. SL Schaeffer 8625 Grant Road St. Louis, MO 63123	Chemcentral New Orleans 333 River Road Jefferson, LA 70121
Clarage 245 Center Street N Birmingham, AL 35204	Clean Air Engineering, Inc. 500 W. Wood Street Palatine, IL 60067	Colorado County Central Appraisal Dist. c/o Chris Stein Gates, Stein & Prause PO Box 458 Columbus, TX 78934
Commonwealth of Massachusetts Dept. of Revenue 51 Sleeper Street, 3 rd Floor Boston, MA 02210	Conam Inspection, Inc. 192 International Blvd. Glendale Heights, IL 60139	Crosfield Catalysts 4099 W. 71 st Street Chicago, IL 60629
David R. Cullen PO Box 368 Jamesport, NY 11947	Deep South Crane & Rigging 15324 Airline Highway Baton Rouge, LA 70817	Ed Smiths Stencil Works 326 Camp Street New Orleans, LA 70130

Entex Gas Marketing Company Robert W. Claude PO Box 2628 Houston, TX 77252-2628	Expansion Joint Systems, Inc. PO Box 711288 Santee, CA 92072-1288	Fair Engineering Sales, Inc. 2022 Tamrest Court Mandeville, LA 70448
First Union National Bank c/o d. Michael Dalton 700 Louisiana, Suite 1900 Houston, TX 77002	Firststar Bank NA Attn: Frank P. Leslie III 101 E. Fifth Street St. Paul, MN 55101	Flexitallic 6915 Highway 225 Deer Park, TX 77216-0711
Frost National Bank Trustee PO Box 1600 San Antonio, TX 78296	GEA Rainey Corporation 5202 W. Channel Road Catoosa, OK 74015	General Mill Supplies, Inc. PO Box 23587 New Orleans, LA 70183
George Singleton c/o James E. Cazalot, jr. 1001 Howard Avenue, Suite 4201 New Orleans, LA 70113	Glencore Ltd. c/o Steven J. Reisman 101 Park Avenue New York, NY 10178-0061	HVAC of Houston Joe S. Maida 5100 Westheimer, Suite 115 Houston, TX 77056-5507
Harbison Walker Refractories Co., Inc. 600 Grant Street, 51 st Floor Pittsburgh, PA 15219	Harmony Corporation PO Box 2750 Baton Rouge, LA 70821	Hartzell Fan, Inc. Attn: Charles Pelitier PO Box 919 Piqua, OH 45356-0919
Heat Transfer Equipment Co. PO Box 580638 Tulsa, OK 74158	Heavy Duty Parts & Equipment, inc. PO Box 66315 Baton Rouge, LA 70896	Highland Fabricators, Inc. PO Drawer 545 Reserve, LA 70084
Hymels Auto Parts & Service, Inc. 501 E. Airline Highway La Place, LA 70068	IOS Capital PO Box 9115 Macon, GA 31208-9115	Insulation Technologies, Inc. Troy M. Dugas 19349 N. Twelfth Street Covington, LA 70434
Ionics, Inc. Attn: D.E. McKenney 65 Grove Street Watertown, MA 02472	Isadore Sutton c/o Harrey E. Cantrell, Jr. 1100 Poydras Street, Suite 2900 New Orleans, LA 70163-2900	Koch Glitsch, Inc. 4900 Singleton Blvd. Dallas, TX 75212
LA Depart. Environmental Quality c/o Ann C. Coco Office of Secretary Legal Affairs PO Box 82282 Baton Rouge, LA 70882-0236	LaPlace Equipment Company, Inc. 167 Jaubert Lane LaPlace, LA 70068	Lab Safety Supply, Inc. 401 S. Wright Road Janesville, Wi 53546-8729
Mannings USA, Inc. Ardith Riazanow 200 Richards Avenue Dover, NJ 07801	National Union Fire Insurance Michelle A. Levitt 70 Pine Street, 31 st Floor New York, NY 10270	Norwell Equipment d/b/a Tristar PO Box 15869 Baton Rouge, LA 70895

Old Dominion Freight Line, Inc. PO Box 2006 High Point, NC 27261-2006	Overhead Underground Electric Supply c/o Wayne T. Crochet 1905 Hickory Avenue Harahan, LA 70123	Pat Tank, Inc. PO Box 2786 Port Arthur, TX 77640
Point to Point Communications, Inc. PO Box 91878 Lafayette, LA 70509	Premier Equipment Corp. PO Box 15203 Baton Rouge, LA 70895	Productioneered Parts Corp. PO Box 8968 The Woodlands, TX 77387
RTL Corporation c/o Gregory A. Miller PO Box 190 Norco, LA 70079	Ralphs of Lafayette, Inc. d/b/a Ralphs Industrial Electric PO Drawer R Lafayette, LA 70502-8018	Rental Service Corporation c/o Kent Walston 2901 Turtle Creek Drive, Suite 105 Port Arthur, TX 77642
River Consulting, Inc. 3500 N. Causeway, Suite 210 Metairie, LA 70002	Roger David Johnson 2661 Hyman Place New Orleans, LA 70131	Scioneaux, Inc. 643 Central Avenue Reserve, LA 70084
Shook Hardy & Bacon LLP 1200 Main Street Kansas City, MO 64105	Siemens Westinghouse Power Corp. 4400 Alafaya Trail Orlando, FL 32826-2399	Smithco Engineering, Inc. Dept. 215 Tulsa, OK 74182
Specialty Alloys, Inc. c/o Kirsten B. David 6513 Perkins Road Baton Rouge, LA 70808	State of Louisiana Dept. of Revenue PO Box 66658 Baton Rouge, LA 70896	Sunbelt Supply, Inc. Lydia Jackson PO Box 85 Houston, TX 77001
T&T Leasing c/o D. Michael Dendy 901 Derbigny Street Gretna, LA 70054	Wilbur E. Hooks, Asst. Director Tennessee Dept. of Revenue Andrew Jackson State Office Building 4 th Floor Nashville, TX 37242	Tex Fab, Inc. c/o Gibbs & Bruns 1100 Louisiana, Suite 5300 Houston, TX 77002
The Cecil Doyle Co., Inc. PO Box 15608 Baton Rouge, LA 70895	The DE Stearns Company PO Box 3456 Shreveport, LA 71133	Thermetrics Maveric Corporation d/b/a Daily Thermetrics 5728 Hartsdale Drive Houston, TX 77036
Thurmond Aylor c/o Daryl J. Daigle 730 Camp Street New Orleans, LA 70130	United States Coast Guard Lt. Daniel Kelleher Coast Guard Island, Building 54C Alameda, CA 94501-5100	Universal Technical Services 909 W. Esplanade Avenue, Suite 108 Kenner, LA 70065
Woodward Governor Company PO Box 1519 Fort Collins, CO 80522-1519	Yuba Heat Transfer Division of Connell Limited Partnership Box 3158 Tulsa, OK 74101	Zurich American Insurance Company c/o Margaret M. Anderson 115 S. LaSalle Street Chicago, IL 60603